

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS**

**Civil Action No. 4:22-cv-00249-ALM**

DIVYA GADASALLI, an individual,  
Plaintiff,

v.

JERRY BULASA, an individual;  
DONG LIAN, an individual; DANYUN LIN, an individual;  
TD BANK, N.A., a national banking association;  
ABACUS FEDERAL SAVINGS BANK, a federal savings bank;  
BINANCE HOLDINGS, LTD. d/b/a Binance, a foreign company; and  
POLONIEX, LLC, a Delaware limited liability company;  
Defendants.

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**PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE  
AGAINST DEFENDANTS TD BANK, N.A. and ABACUS FEDERAL SAVINGS BANK**

PLEASE TAKE NOTICE that, pursuant to Fed.R.Civ.P. 41(a)(1)(A)(i), Plaintiff DIVYA GADASALLI, an individual ("Plaintiff"), by and through her undersigned counsel, hereby DISMISSES WITHOUT PREJUDICE the claims brought against **Defendants TD BANK, N.A., a national banking association ("TD BANK"), and ABACUS FEDERAL SAVINGS BANK, a federal savings bank ("ABACUS BANK")**, in this action. Defendants TD BANK and ABACUS BANK have neither served an Answer nor filed a Motion for Summary Judgment in this action. Accordingly, this action may be dismissed without prejudice as to Defendants TD BANK and ABACUS BANK without an Order of the Court.

**For the sake of clarity, this dismissal is not intended to have any effect on any other claims against any other parties in this litigation.**

Each party is to bear her/its own costs, expenses, and attorneys' fees associated with the above-captioned action.

Respectfully submitted,

**SILVER MILLER**

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing was electronically filed with the Clerk of Court on this 14th day of June 2022 by using the CM/ECF system and that a true and correct copy will be served via electronic mail to: **ALLISON CARROLL, ESQ.**, DUANE MORRIS, LLP, *Counsel for Defendant TD Bank, N.A.*, 100 Crescent Ct. - Suite 200, Dallas, TX 75201, E-mail: [ACarroll@DuaneMorris.com](mailto:ACarroll@DuaneMorris.com); **AMANDA L. COTTRELL, ESQ.**, SHEPPARD MULLIN, *Counsel for Defendant Abacus Federal Savings Bank*, 2200 Ross Avenue - 20th Floor, Dallas, TX 75201, E-mail: [ACottrell@SheppardMullin.com](mailto:ACottrell@SheppardMullin.com); **RYAN SQUIRES, ESQ.**, SCOTT DOUGLASS MCCONNICO LLP, *Counsel for Binance Holdings, Ltd.*, 303 Colorado Street - Suite 2400, Austin, TX 78701, E-mail: [rsquires@scottdoug.com](mailto:rsquires@scottdoug.com); and **KAREN R. KING, ESQ.**, MORVILLO ABRAMOWITZ GRAND IASON & ANELLO, P.C., *Counsel for Binance Holdings, Ltd.*, 565 Fifth Avenue, New York, NY 10017, E-mail: [kking@maglaw.com](mailto:kking@maglaw.com).

/s/ David C. Silver

DAVID C. SILVER